

EXHIBIT B

JULIE STONE
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<p style="text-align: right;">Page 1</p> <p>1 2 UNITED STATES DISTRICT COURT YORK 3 WESTERN DISTRICT OF NEW YORK 4 DR. JOHN A. REPICCI and LORRAINE REPICCI, Individually, and JULIE STONE as Trustee 5 of the JOHN A. REPICCI IRREVOCABLE LIFE INSURANCE TRUST and THE REPICCI 6 IRREVOCABLE FAMILY TRUST, 7 Plaintiffs, 8 v. 9 CHRISTOPHER R. JARVIS and OJM GROUP LLC, 10 Defendants. 11 12 DEPOSITION OF JULIE STONE 13 APPEARING REMOTELY FROM 14 BUFFALO, NEW YORK 15 16 TRANSCRIPT of the stenographic notes of the 17 proceedings in the above-entitled matter, as taken by 18 and before Leah Allbee, a Certified Court Reporter 19 (CCR# 30X100234500), Registered Professional Reporter 20 and Notary Public of the State of New Jersey and New 21 York, taken remotely from Metuchen, New Jersey, on 22 Tuesday, July 27, 2021, at 10:04 a.m. 23 24 25</p> <p style="text-align: right;">Case No.: 1:17-cv-132</p>	<p style="text-align: right;">Page 3</p> <p>1 JULIE STONE 2 REPORTED REMOTELY FROM METUCHEN, NEW JERSEY 3 TUESDAY, JULY 27, 2021, 10:04 a.m. 4 5 THE REPORTER: My name is Leah 6 Allbee, a Certified Shorthand Reporter and 7 Notary Public of the State of New Jersey 8 and New York. This deposition is being 9 held via videoconference equipment. 10 The witness and reporter are not 11 in the same room. The witness will be 12 sworn in remotely, pursuant to agreement 13 of all parties. The parties stipulate 14 that the testimony is being given as if 15 the witness was sworn in person. 16 JULIE STONE, called as a witness, having been 17 first duly sworn by Leah Allbee, a Notary 18 Public within and for the State of New 19 Jersey and New York, was examined and 20 testified as follows: 21 THE REPORTER: Thank you very 22 much. We are all set. 23 EXAMINATION 24 BY MR. TRACY: 25 Q Good morning, Ms. Stone.</p>
<p style="text-align: right;">Page 2</p> <p>1 REMOTE APPEARANCES: 2 3 MAGAVERN MAGAVERN GRIMM, LLP Attorneys for Plaintiffs 4 1100 Rand Building 14 Lafayette Square 5 Buffalo, New York 14203 716-856-3500 6 BY: RICHARD GRIMM, ESQ. rgrimm@magavern.com 7 8 9 WINGET, SPADAFORA & SCHWARTZBERG, LLP Attorneys for the Defendant Christopher R. Jarvis 10 45 Broadway, 32nd Floor New York, New York 10006 212-221-6900 11 BY: MATTHEW TRACY, ESQ. tracy.m@wssllp.com 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 JULIE STONE 2 A Good morning. 3 Q As you know, my name is Matt Tracy. I 4 am counsel for Christopher Jarvis in a lawsuit 5 brought by Dr. John Repicci, John Repicci Trust, and 6 Lorraine Repicci. 7 Have you ever had your deposition taken 8 before? 9 A Yes. 10 Q And in what context did you have it 11 taken? 12 A Oh, you mean for this case or in other 13 cases? 14 Q Other cases. 15 A I run a hotel and somebody claimed 16 that they slipped in the bathroom, and so I had to 17 testify. 18 Q Fine. You are familiar with the 19 process. I will be asking you a series of 20 questions. I would ask that you just respond 21 verbally. If you don't understand a question, I 22 will be happy to rephrase it. And just let me 23 stop -- let me finish speaking before you start your 24 answer, and I will do likewise, so we don't talk 25 over each other.</p>

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<p style="text-align: right;">Page 5</p> <p>1 JULIE STONE</p> <p>2 Are you with me so far?</p> <p>3 A Sure. Okay.</p> <p>4 Q Okay. Great. What, if anything, did</p> <p>5 you do to prepare for today's deposition?</p> <p>6 A I read a bunch of documents that the</p> <p>7 lawyer had given me and I made some phone calls to</p> <p>8 Lincoln Financial Group.</p> <p>9 Q What documents did your lawyers give</p> <p>10 you to review?</p> <p>11 A There are two documents in front of me</p> <p>12 that look like how many payments were made on each</p> <p>13 policy.</p> <p>14 Q Other than those two documents, were</p> <p>15 any other documents given to you to review?</p> <p>16 A Not today.</p> <p>17 Q At any time in preparation for today?</p> <p>18 A There was a folder full of all kinds</p> <p>19 of documents.</p> <p>20 Q And in general, can you describe what</p> <p>21 those documents were?</p> <p>22 A Communications, some of which I</p> <p>23 supplied, faxes from Jarvis. Maybe some faxes or</p> <p>24 communications from Celia Clark.</p> <p>25 Q And okay. Other than those faxes,</p>	<p style="text-align: right;">Page 7</p> <p>1 JULIE STONE</p> <p>2 Q When did you become your father's</p> <p>3 office manager, approximately?</p> <p>4 A I started in 1998. I was doing the</p> <p>5 books. After which time we decided to computerize</p> <p>6 the office and put electronic medical records, and I</p> <p>7 was in charge of that project. I trained all of the</p> <p>8 people. That may have been in like 2003, '4, '5,</p> <p>9 something like that. And then I stayed there doing</p> <p>10 the books until 2018, until they retired.</p> <p>11 Q When you started in 2013, did your</p> <p>12 father's medical practice operate under an LLC, a</p> <p>13 sole proprietorship or something else, to your</p> <p>14 knowledge?</p> <p>15 A When I started -- well, I was doing</p> <p>16 the books in 1998. I think he was a sole</p> <p>17 proprietor. In about the year 2000, my</p> <p>18 brother-in-law and sister graduated from medical</p> <p>19 school so they formed an LLC, the three of them.</p> <p>20 Q After that LLC was formed, did they</p> <p>21 ever change into any other type of structure?</p> <p>22 A No.</p> <p>23 Q Now, did there come a time where you</p> <p>24 became trustee of the Repicci Irrevocable Family</p> <p>25 Trust?</p>
<p style="text-align: right;">Page 6</p> <p>1 JULIE STONE</p> <p>2 were there any other documents that you reviewed in</p> <p>3 preparation for today?</p> <p>4 A I don't think so.</p> <p>5 Q Just briefly, as an overview as your</p> <p>6 father did yesterday, can you just briefly give me</p> <p>7 your employment and educational background since</p> <p>8 college?</p> <p>9 A Okay. So I have a master's degree in</p> <p>10 electrical engineering. I worked for Kodak for ten</p> <p>11 years. After that, I quit and started working in</p> <p>12 the family business which is a hotel. And I also</p> <p>13 worked for my father as the office manager in his</p> <p>14 medical practice.</p> <p>15 Q And approximately what years did you</p> <p>16 work for Kodak?</p> <p>17 A 1988 to 1999.</p> <p>18 Q And as you indicated, the family</p> <p>19 business is a hotel?</p> <p>20 A Right.</p> <p>21 Q What's the name of that hotel?</p> <p>22 A Darien Lakes Econo Lodge.</p> <p>23 Q How long did you work there?</p> <p>24 A I am still working there. It's been</p> <p>25 about 20 years.</p>	<p style="text-align: right;">Page 8</p> <p>1 JULIE STONE</p> <p>2 A Yes.</p> <p>3 Q And when did that happen?</p> <p>4 A I believe it was at the inception of</p> <p>5 this trust.</p> <p>6 Q And when was that trust incepted?</p> <p>7 A There are two trusts that we are</p> <p>8 talking about. One was incepted in maybe 2002 and</p> <p>9 the other in 2006. I am unclear as to which one,</p> <p>10 you know, we are speaking about.</p> <p>11 Q Okay. Let me -- I think this might</p> <p>12 help is if you can look -- I sent to Richard -- we</p> <p>13 have marked them I believe as -- I call them --</p> <p>14 today I will make it a little easier. Repicci/Stone</p> <p>15 A and B.</p> <p>16 MR. TRACY: Ms. Allbee, have you</p> <p>17 marked them yet?</p> <p>18 THE REPORTER: No.</p> <p>19 MR. TRACY: If you can.</p> <p>20 And, Richard, just for your</p> <p>21 benefit, what I want to mark and I will</p> <p>22 mark it as Defendant's Repicci/Stone is a</p> <p>23 correspondence. It's a three-page letter</p> <p>24 dated February 25, 2021, from Lincoln</p> <p>25 Financial Group, and it's addressed to the</p>

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<p style="text-align: right;">Page 9</p> <p>1 JULIE STONE</p> <p>2 John A. Repicci Irrevocable Insurance</p> <p>3 Trust, Julie Stone, Trustee, 120 Deer Run,</p> <p>4 Williamsville.</p> <p>5 MR. GRIMM: All right. The</p> <p>6 witness has two of them in front of her.</p> <p>7 THE WITNESS: Okay.</p> <p>8 (Letter dated February 25, 2021</p> <p>9 was marked as Defendant's Repicci/Stone</p> <p>10 Exhibit A for identification, as of this</p> <p>11 date.)</p> <p>12 MR. TRACY: Fantastic. Even</p> <p>13 better. Even better.</p> <p>14 Okay. And then if you can also</p> <p>15 put -- what I will mark as B the</p> <p>16 correspondence of the same date,</p> <p>17 February 25, 2021, Repicci Irrevocable</p> <p>18 Family Trust. Yes. Julie Stone, Trustee,</p> <p>19 and Hyman Polakoff, Trustee, 5818 Bradford</p> <p>20 Court, East Amherst, New York.</p> <p>21 (Letter dated February 25, 2021</p> <p>22 was marked as Defendant's Repicci/Stone</p> <p>23 Exhibit B for identification, as of this</p> <p>24 date.)</p> <p>25 Q Ms. Stone, when you have both of them</p>	<p style="text-align: right;">Page 11</p> <p>1 JULIE STONE</p> <p>2 I don't think I have the FedEx envelope.</p> <p>3 Q Okay. Let me ask you this: Would you</p> <p>4 have kept the file of insurance documents related to</p> <p>5 these two policies?</p> <p>6 A I would have kept things that came to</p> <p>7 me, yes.</p> <p>8 Q Okay. And what things over the years</p> <p>9 in general would have come to you?</p> <p>10 A Well, the original trust document and</p> <p>11 any faxes from Chris Jarvis and Celia on telling me</p> <p>12 what to do about this trust.</p> <p>13 Q Would you have been in receipt of any</p> <p>14 annual statements from Lincoln with respect to these</p> <p>15 two policies?</p> <p>16 A Well, not -- only -- first of all, the</p> <p>17 address on this is 120 Deer Run. That is not my</p> <p>18 address. So I would have not been directly mailed</p> <p>19 anything unless my parents had given it to me.</p> <p>20 Q Fair enough. Would your parents be --</p> <p>21 strike that.</p> <p>22 Would you recall your parents ever</p> <p>23 bringing to you any documents related to either the</p> <p>24 trusts or the insurance policies in the trusts?</p> <p>25 A No. Only -- the documents that I had</p>
<p style="text-align: right;">Page 10</p> <p>1 JULIE STONE</p> <p>2 in front of you, just let me know.</p> <p>3 A Okay. I have them.</p> <p>4 Q Okay. Great. I am going to look at</p> <p>5 the first one which this one is addressed to</p> <p>6 yourself at Deer Run. And it seems to indicate that</p> <p>7 the policy is the 7146026 which I would represent to</p> <p>8 you is the older one, the 2002 policy.</p> <p>9 Is it fair to state that the</p> <p>10 Irrevocable -- the John A. Repicci Irrevocable</p> <p>11 Insurance Trust was incepted for the purpose of</p> <p>12 containing the policy which I will call the 26 policy?</p> <p>13 A Yes.</p> <p>14 Q Do you recall signing any trust</p> <p>15 documents to incept this trust?</p> <p>16 A Yes.</p> <p>17 Q And when did you sign those documents?</p> <p>18 A Probably in 2002 when they were</p> <p>19 presented to me.</p> <p>20 Q Who presented them to you?</p> <p>21 A It may have come in a FedEx from Celia</p> <p>22 Clark.</p> <p>23 Q Would you still have a copy of that</p> <p>24 FedEx?</p> <p>25 A I would have a copy of the documents.</p>	<p style="text-align: right;">Page 12</p> <p>1 JULIE STONE</p> <p>2 were in the beginning of setting up the trust, not</p> <p>3 as an ongoing basis.</p> <p>4 Q And Exhibit B has an address in East</p> <p>5 Amherst, New York. Would that be your address?</p> <p>6 A That is my address, yes.</p> <p>7 Q And let me make sure I am doing</p> <p>8 this -- just bear with me.</p> <p>9 Okay. And with respect to the family</p> <p>10 trust, it indicates that Hy Polakoff is your</p> <p>11 co-trustee. Did you have any discussions with</p> <p>12 Mr. Polakoff about the family trust or the insurance</p> <p>13 within the family trust?</p> <p>14 A Back when this was being set up, I am</p> <p>15 sure I had spoken with him about documents or</p> <p>16 payments. But he has since retired and moved to</p> <p>17 Florida, so I really hadn't had any interaction with</p> <p>18 him personally for ten years.</p> <p>19 Q Okay. So is it fair to state that you</p> <p>20 have not had any interaction with Hy Polakoff since</p> <p>21 about 2011, it sounds like or --</p> <p>22 A Yes. Except yesterday when I did talk</p> <p>23 to him because I needed to get his address.</p> <p>24 Q And when you were in the process of</p> <p>25 getting his address, did you have any discussions</p>

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<p style="text-align: right;">Page 13</p> <p>1 JULIE STONE</p> <p>2 regarding the policies or the trusts?</p> <p>3 A No.</p> <p>4 Q And prior to 2011, did you speak with</p> <p>5 Mr. Polakoff on any type of regular basis about the</p> <p>6 trust or the policy within the trust?</p> <p>7 A No.</p> <p>8 Q Prior to 2011, did you talk to</p> <p>9 Mr. Polakoff on an irregular basis or at any time</p> <p>10 did you discuss the trust or the policy within the</p> <p>11 trust?</p> <p>12 A No.</p> <p>13 Q In looking at the older policy which I</p> <p>14 believe is -- again, I am going to get these wrong,</p> <p>15 but I just want to make sure I get this -- it's the</p> <p>16 Irrevocable Insurance Trust.</p> <p>17 Actually, quick question before that.</p> <p>18 Why were there two trusts, if you know?</p> <p>19 A I don't know for sure.</p> <p>20 Q Were you ever told why there were two</p> <p>21 trusts or have a general idea of why?</p> <p>22 A No, I was never told why there were</p> <p>23 two.</p> <p>24 Q Are you familiar with an entity called</p> <p>25 Ebi-Repicci, LLC?</p>	<p style="text-align: right;">Page 15</p> <p>1 JULIE STONE</p> <p>2 essentially erased.</p> <p>3 Q Okay. Let me show -- I believe I sent</p> <p>4 it to your attorney this morning. And this was</p> <p>5 if -- you know what we will do, I had this premarked</p> <p>6 as Exhibit D which is the copy of the insurance</p> <p>7 policy, the 144 insurance policy. This is the one</p> <p>8 in 2006. And --</p> <p>9 MR. GRIMM: Matthew, when did you</p> <p>10 send that? Because I didn't see it. Did</p> <p>11 you send it after you sent the other --</p> <p>12 MR. TRACY: I thought I -- I sent</p> <p>13 it -- I apologize. I sent it to you about</p> <p>14 20 minutes ago.</p> <p>15 MR. GRIMM: Okay. I didn't check.</p> <p>16 That's okay.</p> <p>17 MR. TRACY: Yes. I knew it was</p> <p>18 right around that point, as I am showing</p> <p>19 at 10:04, when we just started. I guess</p> <p>20 it took a little longer.</p> <p>21 Just so we're not wasting the</p> <p>22 witness's time, Ms. Allbee, you have that</p> <p>23 exhibit marked?</p> <p>24 THE REPORTER: Can I go off the</p> <p>25 record?</p>
<p style="text-align: right;">Page 14</p> <p>1 JULIE STONE</p> <p>2 A Yes.</p> <p>3 Q And what is your understanding of that</p> <p>4 entity?</p> <p>5 A So when these trusts or one of them</p> <p>6 was set up, the trust -- the insurance was in that</p> <p>7 entity. That entity was set up as an offshore</p> <p>8 account, as some kind of tax haven or whatnot.</p> <p>9 What happened after it was set up, years</p> <p>10 later, that triggered an IRS audit for my father. Hy</p> <p>11 Polakoff was involved in straightening that out or</p> <p>12 responding to the audit because he was my father's</p> <p>13 accountant at the time. And I was told that the trust</p> <p>14 is screwed up. And, you know, there was an audit.</p> <p>15 And this probably is not the way that this needs to be</p> <p>16 set up. And so sometime later, this insurance policy</p> <p>17 was taken out of Ebi-Repicci and that was abandoned,</p> <p>18 that Ebi-Repicci.</p> <p>19 Q And where was the insurance policy</p> <p>20 placed at that point?</p> <p>21 A Into -- I forget which policy it was,</p> <p>22 but it was placed directly in the trust. I believe</p> <p>23 Ebi-Repicci owned the trust or the trust owned</p> <p>24 Ebi-Repicci and the insurance was in it. But then</p> <p>25 Ebi-Repicci could not be an entity, and so that was</p>	<p style="text-align: right;">Page 16</p> <p>1 JULIE STONE</p> <p>2 MR. TRACY: I am sorry?</p> <p>3 THE REPORTER: Can I go off the</p> <p>4 record?</p> <p>5 MR. TRACY: Sure. Of course.</p> <p>6 (Discussion off the record.)</p> <p>7 MR. TRACY: C will be what is</p> <p>8 called the 44 policy. It ends in 44,</p> <p>9 dated in 2006.</p> <p>10 Exhibit D, the 26 policy dated in</p> <p>11 2002.</p> <p>12 Exhibit E letter dated May 6,</p> <p>13 2015.</p> <p>14 (Policy Number 7317144, dated</p> <p>15 December 21, 2006, was marked as Exhibit C</p> <p>16 for identification, as of this date.)</p> <p>17 (Policy Number 7146026, dated</p> <p>18 December 10, 2002, was marked as Exhibit D</p> <p>19 for identification, as of this date.)</p> <p>20 (Letter dated May 6, 2015, was</p> <p>21 marked as Exhibit E for identification, as</p> <p>22 of this date.)</p> <p>23 MR. TRACY: What I want the</p> <p>24 witness to look at is the 144 policy.</p> <p>25 MR. GRIMM: We are still off the</p>

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<p style="text-align: right;">Page 17</p> <p>1 JULIE STONE</p> <p>2 record.</p> <p>3 THE REPORTER: I just went back</p> <p>4 on.</p> <p>5 MR. TRACY: Let's go off again.</p> <p>6 (Discussion off the record.)</p> <p>7 BY MR. TRACY:</p> <p>8 Q Back on.</p> <p>9 If you could look, Ms. Stone, at Exhibit</p> <p>10 C which is the 2006 policy. If you go to -- it's page</p> <p>11 41 of 50. They should have little -- they do, yes.</p> <p>12 They are numbered on the top. Page 41 of 50.</p> <p>13 A Okay.</p> <p>14 Q And it indicates -- and this is for</p> <p>15 the 144 policy in 2006. If you go down towards the</p> <p>16 top of the page -- actually in the bottom as well --</p> <p>17 it indicates owner Ebi-Repicci, LLC. Does that</p> <p>18 refresh your recollection that Ebi-Repicci owned the</p> <p>19 2006 policy?</p> <p>20 A Yes.</p> <p>21 Q And do you know who the members of the</p> <p>22 Ebi-Repicci, LLC were?</p> <p>23 A No.</p> <p>24 Q Were you a member at any time?</p> <p>25 A I don't know.</p>	<p style="text-align: right;">Page 19</p> <p>1 JULIE STONE</p> <p>2 A If you mean strategy, no.</p> <p>3 Q Just so we are clear -- yes. Did you</p> <p>4 discuss with him the strategy of the policy or the</p> <p>5 purpose of the policy with Chris Jarvis?</p> <p>6 A No. Not beyond my parents wanted to</p> <p>7 do this. This was life insurance after they died</p> <p>8 that would pay to the family in some purpose. That</p> <p>9 was my understanding.</p> <p>10 Q Did you discuss the purpose of the</p> <p>11 policy or the trust with your parents?</p> <p>12 A Not beyond that I needed to sign</p> <p>13 papers and I was the trustee.</p> <p>14 Q Did anybody in 2002 explain to you</p> <p>15 what your duties and responsibilities as trustee</p> <p>16 were going to be?</p> <p>17 A No.</p> <p>18 Q Did you discuss the policy or the</p> <p>19 insurance trust in 2002 with your mother?</p> <p>20 A Not beyond signing papers and moving</p> <p>21 money around to pay the premium initially.</p> <p>22 Q If you know, who would have been more</p> <p>23 in charge of the strategy behind the policy: your</p> <p>24 father or your mother?</p> <p>25 A My father would have been behind the</p>
<p style="text-align: right;">Page 18</p> <p>1 JULIE STONE</p> <p>2 Q Did you keep the operating agreement</p> <p>3 of Ebi-Repicci in your records?</p> <p>4 MR. GRIMM: Object to the form.</p> <p>5 You can answer.</p> <p>6 A I don't know.</p> <p>7 Q When the -- let's make sure -- when</p> <p>8 the John A. Repicci Irrevocable Insurance Trust --</p> <p>9 and that's the first trust -- was formed, what was</p> <p>10 your understanding of what it was for?</p> <p>11 A That it was life insurance when my</p> <p>12 parents died.</p> <p>13 Q Okay. And at that time, in or about</p> <p>14 2002 -- strike that.</p> <p>15 At that time in about 2002, did you have</p> <p>16 any discussions with Chris Jarvis about the insurance</p> <p>17 policy or the trust?</p> <p>18 A Yes.</p> <p>19 Q What conversations did you have?</p> <p>20 A It was mostly about setting up bank</p> <p>21 accounts, transferring -- wire transferring money,</p> <p>22 getting a tax ID number, signing papers.</p> <p>23 Q Did you have any what I will call</p> <p>24 substantive conversation with him about the purpose</p> <p>25 of the policy or the purpose of the trust?</p>	<p style="text-align: right;">Page 20</p> <p>1 JULIE STONE</p> <p>2 strategy of it.</p> <p>3 Q And what would your mother's role be,</p> <p>4 if any?</p> <p>5 A Moving money around, signing papers,</p> <p>6 that kind of thing.</p> <p>7 Q In 2002, did there ever come a time</p> <p>8 when you personally met with Christopher Jarvis?</p> <p>9 A No.</p> <p>10 Q A more general question: Did there</p> <p>11 ever come a time when you personally met with</p> <p>12 Christopher Jarvis?</p> <p>13 A No.</p> <p>14 Q And you were talking about the</p> <p>15 Ebi-Repicci, LLC triggered an audit. How were you</p> <p>16 made aware of that?</p> <p>17 A My father had discussed that he was</p> <p>18 being audited. Right?</p> <p>19 Q Fair enough. That sounds fun. Okay.</p> <p>20 Other than Mr. Polakoff, did anyone else</p> <p>21 assist him with the audit, if you know?</p> <p>22 A Not to my knowledge.</p> <p>23 Q What involvement, if any, did you have</p> <p>24 with respect to the audit?</p> <p>25 A None.</p>

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<p style="text-align: right;">Page 21</p> <p>1 JULIE STONE</p> <p>2 Q Now, you have a degree in engineering;</p> <p>3 correct?</p> <p>4 A Yes.</p> <p>5 Q Do you have any -- subsequent to that,</p> <p>6 have you taken any financial courses or the like?</p> <p>7 A No.</p> <p>8 Q And with respect to the family hotel</p> <p>9 business, do you handle the books and records of</p> <p>10 that hotel business?</p> <p>11 A Yes, I do.</p> <p>12 Q And with respect to the hotel</p> <p>13 business, are there any life insurance policies or</p> <p>14 life insurance trusts involved with that business?</p> <p>15 A No.</p> <p>16 Q Other than these two insurance trusts,</p> <p>17 have you ever been the trustee of any other trust?</p> <p>18 A No.</p> <p>19 Q In 2002, did you have any discussions</p> <p>20 with Hy Polakoff regarding the insurance policy or</p> <p>21 the insurance trust?</p> <p>22 A No.</p> <p>23 Q This is with respect to the first</p> <p>24 insurance trustee, John A. Repicci Irrevocable Life</p> <p>25 Insurance trustee. Did there ever come a time at</p>	<p style="text-align: right;">Page 23</p> <p>1 JULIE STONE</p> <p>2 trusts.</p> <p>3 Q Do you know the approximate amount of</p> <p>4 that bank account?</p> <p>5 A \$500,000.</p> <p>6 Q Did there come a time in or about 2014</p> <p>7 when you were made aware that there were issues with</p> <p>8 the policies within these trusts?</p> <p>9 A I can't recall what year it was, but,</p> <p>10 yes, I was made aware that there were problems.</p> <p>11 Q How were you made aware?</p> <p>12 A My father had told me about this</p> <p>13 Eib-Repicci [sic] thing -- I don't know what year it</p> <p>14 was -- but the whole audit issue.</p> <p>15 Q After that, other than the Eib-Repicci</p> <p>16 [sic] issue, were you made aware of any other issue</p> <p>17 with respect to the policy or the trusts?</p> <p>18 A I was made aware maybe over the last</p> <p>19 year and a half, two years, that they thought</p> <p>20 they -- their life insurance policies were expiring</p> <p>21 and it became an emergency to figure out how to get</p> <p>22 life insurance. I don't think it was back in 2014,</p> <p>23 though.</p> <p>24 Q How were you made aware of that?</p> <p>25 A My father said to me, "You need to</p>
<p style="text-align: right;">Page 22</p> <p>1 JULIE STONE</p> <p>2 any point that you had discussions with Hy Polakoff</p> <p>3 regarding the trust or the insurance policy within</p> <p>4 the trust?</p> <p>5 A No.</p> <p>6 Q With respect to the John A. Repicci</p> <p>7 Irrevocable Insurance Trust, other than the Lincoln</p> <p>8 policy, are there any other assets or insurance</p> <p>9 policies within that trust?</p> <p>10 A I believe that one also contains the</p> <p>11 MassMutual policy, but I am unsure.</p> <p>12 Q Same question with respect to the</p> <p>13 Repicci Irrevocable Family Trust. Other than the</p> <p>14 Lincoln policy, are there any other assets or</p> <p>15 insurance policies within that policy -- within that</p> <p>16 trust?</p> <p>17 A Okay. I am unsure. I know that there</p> <p>18 is a MassMutual policy that is contained in one of</p> <p>19 these trusts. There is also a bank account that is</p> <p>20 contained in one of these trusts, but I am not sure</p> <p>21 which one contains them.</p> <p>22 Q Fair enough. What bank account is it</p> <p>23 contained in one of them?</p> <p>24 A There is a Bank of America account</p> <p>25 that has some money in it that's in one of these</p>	<p style="text-align: right;">Page 24</p> <p>1 JULIE STONE</p> <p>2 find out about these insurance policies because</p> <p>3 nobody will talk to me. You are the trustee, and</p> <p>4 you are the person that can actually make these</p> <p>5 phone calls."</p> <p>6 Q Did there ever come a time -- strike</p> <p>7 that.</p> <p>8 Were you ever made aware that insurance</p> <p>9 consultants were hired to review these policies?</p> <p>10 A I paid a bill from the medical</p> <p>11 practice -- it must have been prior to 2018 -- to</p> <p>12 Policy Guard, and I was told that this person was</p> <p>13 going to help with insurance policies.</p> <p>14 Q And did you ever have any</p> <p>15 conversations with anyone at Policy Guard regarding</p> <p>16 these policies?</p> <p>17 A No.</p> <p>18 Q Were you ever -- strike that.</p> <p>19 Are you aware if Policy Guard ever</p> <p>20 produced a report regarding these policies?</p> <p>21 A No, I am not aware.</p> <p>22 Q Would you have ever been in the</p> <p>23 practice of emailing Chris Jarvis regarding these</p> <p>24 policies or the trusts?</p> <p>25 A I may have, but communication was a</p>

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<p style="text-align: right;">Page 25</p> <p>1 JULIE STONE</p> <p>2 lot of faxing, I recall.</p> <p>3 Q And if you were to email -- well,</p> <p>4 strike that.</p> <p>5 If you were to fax, would that be from</p> <p>6 the office fax, your parents' personal fax or</p> <p>7 something else?</p> <p>8 A My personal fax number at my home</p> <p>9 office.</p> <p>10 Q Would you have kept a record of all of</p> <p>11 those faxes?</p> <p>12 A Yes.</p> <p>13 MR. TRACY: If you could show the</p> <p>14 witness Exhibit E, her Exhibit E, which is</p> <p>15 the May 6, 2015 letter.</p> <p>16 MR. GRIMM: That's Exhibit F from</p> <p>17 yesterday and Exhibit E from today?</p> <p>18 MR. TRACY: Yes.</p> <p>19 MR. GRIMM: I am sorry. How do we</p> <p>20 have that, Repicci-Stone what for today?</p> <p>21 MR. TRACY: I am sorry?</p> <p>22 MR. GRIMM: What is it marked for</p> <p>23 today?</p> <p>24 MR. TRACY: E.</p> <p>25 MR. GRIMM: E, as in Edward?</p>	<p style="text-align: right;">Page 27</p> <p>1 JULIE STONE</p> <p>2 Q And who was your insurance broker?</p> <p>3 A It was Dave Noto who had his own</p> <p>4 practice and he subsequently went to M&T Bank</p> <p>5 Insurance.</p> <p>6 Q To your knowledge, did you ever have a</p> <p>7 discussion with David Noto about the insurance</p> <p>8 policy or the trust?</p> <p>9 A No. I solely interacted with him</p> <p>10 about like commercial liability, that kind of thing,</p> <p>11 for the business.</p> <p>12 Q To your knowledge, did your father</p> <p>13 ever try to obtain insurance, life insurance, from</p> <p>14 anyone other than Lincoln or MassMutual --</p> <p>15 A No.</p> <p>16 Q -- for the period -- for the last 15</p> <p>17 years?</p> <p>18 Yes, I know you are -- okay.</p> <p>19 So your father asked you to reach out to</p> <p>20 Lincoln Financial as trustee to make phone calls and</p> <p>21 communications and the like. Have you had any</p> <p>22 discussions with Lincoln Financial about these</p> <p>23 policies?</p> <p>24 A Yes.</p> <p>25 Q When did those discussions take place?</p>
<p style="text-align: right;">Page 26</p> <p>1 JULIE STONE</p> <p>2 MR. TRACY: E, Edward, yes.</p> <p>3 Q Have you ever seen this letter before?</p> <p>4 A No.</p> <p>5 Q And so I will just paraphrase, real</p> <p>6 quick, for the sake of time. It indicates that your</p> <p>7 father had received information from the insurance</p> <p>8 consultant. Were you ever provided information from</p> <p>9 the insurance consultant regarding the policies?</p> <p>10 A No.</p> <p>11 Q Were you ever made aware of who hired</p> <p>12 the insurance people?</p> <p>13 A I had paid the bill. I had created a</p> <p>14 check to pay the person that -- Policy Guard -- and</p> <p>15 assuming that my father retained him because that</p> <p>16 bill was in my inbox.</p> <p>17 Q Okay. To your knowledge, did your</p> <p>18 father have any -- and this is back in 2015 -- would</p> <p>19 your father have had any financial advisors?</p> <p>20 A No. I know that he interacts with</p> <p>21 Bank of America and that he interacts with Fisher</p> <p>22 Investments. That's it.</p> <p>23 Q With respect to the medical practice,</p> <p>24 did you have an insurance broker?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 28</p> <p>1 JULIE STONE</p> <p>2 A I would say in the last year I had</p> <p>3 called periodically on several issues.</p> <p>4 Q What would those issues be, to the</p> <p>5 best of your recollection?</p> <p>6 A Well, I believe these two reports,</p> <p>7 Exhibit A and B, I must have called to get how much</p> <p>8 money did we pay into each policy. I called because</p> <p>9 I wanted to understand who actually owned the</p> <p>10 policies and is Eib-Repicci [sic] off of them which</p> <p>11 it is. And I called to get several illustrations</p> <p>12 regarding a bunch of different scenarios.</p> <p>13 Q And with respect to the illustration,</p> <p>14 what is your understanding of the amount of money</p> <p>15 needed to keep these policies in place until your</p> <p>16 parents are 95?</p> <p>17 A Well, there are two separate</p> <p>18 illustrations. I mean, I can't recall off the top</p> <p>19 of my head. But I believe each one, if we were to</p> <p>20 make a lump-sum payment in -- like in a year or this</p> <p>21 year, each one I believe was to the tune of like</p> <p>22 \$1.2 million.</p> <p>23 Q Was there any discussion on making</p> <p>24 those payments over a period of time?</p> <p>25 A Yes. So then we got illustrations</p>

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<p style="text-align: right;">Page 29</p> <p>1 JULIE STONE</p> <p>2 over five years and ten years.</p> <p>3 Q And those five-year and ten-year</p> <p>4 illustrations would allow you to pay that out over</p> <p>5 time rather than a lump sum?</p> <p>6 A Yes. Yes.</p> <p>7 Q And with respect to -- if you go to, I</p> <p>8 believe -- bear with me -- your Exhibit B which is</p> <p>9 for the family trust.</p> <p>10 MR. GRIMM: I am sorry. Which</p> <p>11 exhibit?</p> <p>12 MR. TRACY: Exhibit B.</p> <p>13 MR. GRIMM: From today?</p> <p>14 MR. TRACY: From today.</p> <p>15 MR. GRIMM: Okay.</p> <p>16 Q If you go to page 3 and it seems to</p> <p>17 indicate for the 144 policy that payments were made</p> <p>18 in 2017 and 2018. Do you see that?</p> <p>19 A Yes.</p> <p>20 Q And this letter is dated February of</p> <p>21 2021. What prompted the payments in 2017 and 2018,</p> <p>22 if you know?</p> <p>23 A I don't know.</p> <p>24 Q Do you know why payments were not made</p> <p>25 for 2019 and 2020?</p>	<p style="text-align: right;">Page 31</p> <p>1 JULIE STONE</p> <p>2 A No.</p> <p>3 Q When was the first time for either</p> <p>4 policy that you reviewed a policy illustration?</p> <p>5 A Within the last two years, when my</p> <p>6 father told me that he thought he had no insurance</p> <p>7 and that I had to start making phone calls.</p> <p>8 Q Prior to two years ago, did you have</p> <p>9 any -- strike that.</p> <p>10 Between 2006 and approximately two years</p> <p>11 ago, how many discussions would you have had with your</p> <p>12 father about these insurance policies or the trusts?</p> <p>13 A I had a discussion with the IRS thing</p> <p>14 and the Eib-Repicci [sic], whenever that occurred.</p> <p>15 And then within the last two years with this all</p> <p>16 coming up.</p> <p>17 Q Other than those two issues, did you</p> <p>18 ever have any discussion with your father or your</p> <p>19 mother about their expectations for the policy, how</p> <p>20 the policies were doing, that sort of thing?</p> <p>21 A No. No. And I did have a discussion</p> <p>22 when he hired that Neil Finestone firm because it</p> <p>23 was an unfamiliar bill and I didn't know what it was</p> <p>24 for, and so I asked. And he told me there was a</p> <p>25 problem with the policies and he was asking this</p>
<p style="text-align: right;">Page 30</p> <p>1 JULIE STONE</p> <p>2 A No.</p> <p>3 Q And looking at the first page, again</p> <p>4 this indicates that Hyman Polakoff is trustee of the</p> <p>5 family trust as well. Had you had any discussions</p> <p>6 with him regarding making additional payments?</p> <p>7 A No.</p> <p>8 Q To your knowledge, has your father had</p> <p>9 any discussions with Hy Polakoff regarding the</p> <p>10 family trust?</p> <p>11 A No.</p> <p>12 Q To your knowledge, did you have any</p> <p>13 discussions with Mr. Polakoff about him resigning as</p> <p>14 trustee of this trust?</p> <p>15 A No. I personally have not.</p> <p>16 Q To your knowledge, other than your</p> <p>17 father's testimony yesterday, were you aware of any</p> <p>18 conversations between your father and Mr. Polakoff</p> <p>19 that he wanted to resign as trustee?</p> <p>20 A No.</p> <p>21 Q Going back to -- I know this is a</p> <p>22 while back -- 2002. Did you review any of the</p> <p>23 policy illustrations in 2002?</p> <p>24 A No.</p> <p>25 Q At that time?</p>	<p style="text-align: right;">Page 32</p> <p>1 JULIE STONE</p> <p>2 person to review them.</p> <p>3 Q After -- other than with respect to</p> <p>4 that conversation regarding the payment to Policy</p> <p>5 Guard, did you have any discussions with your father</p> <p>6 about the conclusions that Policy Guard may have</p> <p>7 reached?</p> <p>8 A No.</p> <p>9 Q And between -- during the Repicci</p> <p>10 issue, did you have any conversations with Chris</p> <p>11 Jarvis?</p> <p>12 A I don't understand. What do you mean</p> <p>13 by the Repicci issue?</p> <p>14 Q I am sorry. The Ebi-Repicci, LLC --</p> <p>15 the tax audit issue.</p> <p>16 A I don't recall. No.</p> <p>17 Q You had no discussion with him.</p> <p>18 Did you have discussions with Celia</p> <p>19 Clark at that time?</p> <p>20 A Yes.</p> <p>21 Q Yes. I don't want you -- because she</p> <p>22 is an attorney, I don't want you to get into</p> <p>23 privileged communications.</p> <p>24 And then would you have had any</p> <p>25 discussion with Hy Polakoff at that time?</p>

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<p style="text-align: right;">Page 33</p> <p>1 JULIE STONE</p> <p>2 A No.</p> <p>3 Q Now, just so I am clear, the family</p> <p>4 trust was formed after the IRS audit; is that</p> <p>5 correct?</p> <p>6 A I don't know. What I think is that</p> <p>7 both of these trusts were set up and one of them,</p> <p>8 because Eib-Repicci [sic] was involved or an</p> <p>9 ownership of one of these policies, that was the</p> <p>10 trigger for the IRS audit. That's what I believe.</p> <p>11 Q Okay. Just so I am clear, do you know</p> <p>12 approximately when the Repicci Family Trust was set</p> <p>13 up?</p> <p>14 A In about 2006, directly preceding</p> <p>15 buying these policies.</p> <p>16 Q And from 2006 through 2011, did it</p> <p>17 have any policies or other assets in it?</p> <p>18 A In 2006, it would have had this</p> <p>19 Lincoln policy, 7144. This may also be the trust</p> <p>20 that has the \$500,000 in it, but I am not sure.</p> <p>21 Q But you are not sure, okay.</p> <p>22 MR. TRACY: Subject to what I</p> <p>23 review in my -- the document production</p> <p>24 from Friday, and I will reserve my right</p> <p>25 to call you back, but I have no further</p>	<p style="text-align: right;">Page 35</p> <p>1</p> <p>2 C A P T I O N</p> <p>3</p> <p>4 The Deposition of Julie Stone, taken in the</p> <p>5 matter, on the date, and at the time and place set</p> <p>6 out on the title page hereof.</p> <p>7</p> <p>8</p> <p>9 It was requested that the deposition be taken by</p> <p>10 the reporter and that same be reduced to</p> <p>11 typewritten form.</p> <p>12</p> <p>13</p> <p>14 The Deponent will read and sign the transcript</p> <p>15 of said deposition.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 34</p> <p>1 JULIE STONE</p> <p>2 questions for you. We are done for today.</p> <p>3 MR. GRIMM: Thank you.</p> <p>4 THE WITNESS: Thank you.</p> <p>5 MR. TRACY: Let's go off the</p> <p>6 record.</p> <p>7 THE REPORTER: Are you ordering</p> <p>8 the final transcript of this?</p> <p>9 MR. TRACY: Me, yes. PDF. I</p> <p>10 don't need a hard copy.</p> <p>11 THE REPORTER: Mr. Grimm, are you</p> <p>12 ordering a copy?</p> <p>13 MR. GRIMM: Matt, do you supply or</p> <p>14 no?</p> <p>15 MR. TRACY: Yes, I am supplying</p> <p>16 that. Yes.</p> <p>17 MR. GRIMM: I will take a PDF as</p> <p>18 well.</p> <p>19 (Time noted: 10:59 a.m.)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 36</p> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 STATE OF _____:</p> <p>5 COUNTY/CITY OF _____:</p> <p>6</p> <p>7 Before me, this day, personally appeared</p> <p>8 Julie Stone, who, being duly sworn, states</p> <p>9 that the foregoing transcript of his/her</p> <p>10 Deposition, taken in the matter, on the date, and</p> <p>11 at the time and place set out on the title page</p> <p>12 hereof, constitutes a true and accurate transcript</p> <p>13 of said deposition.</p> <p>14</p> <p>15 _____</p> <p>16 Julie Stone</p> <p>17</p> <p>18</p> <p>19 SUBSCRIBED and SWORN to before me this _____</p> <p>20 day of _____, 2021, in the</p> <p>21 jurisdiction aforesaid.</p> <p>22</p> <p>23 _____</p> <p>24 My Commission Expires _____ Notary Public</p> <p>25</p>

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<div style="display: flex; justify-content: space-between;"> 1 DEPOSITION ERRATA SHEET </div> <div style="display: flex; justify-content: space-between;"> 2 RE: </div> <div style="display: flex; justify-content: space-between;"> 3 FILE NO. </div> <div style="display: flex; justify-content: space-between;"> 4 CASE CAPTION: Repicci vs. Jarvis </div> <div style="display: flex; justify-content: space-between;"> 5 DEPONENT: Julie Stone </div> <div style="display: flex; justify-content: space-between;"> 6 DEPOSITION DATE: July 27, 2021 </div> <div style="display: flex; justify-content: space-between;"> 7 To the Reporter: </div> <div style="display: flex; justify-content: space-between;"> 8 I have read the entire transcript of my Deposition </div> <div style="display: flex; justify-content: space-between;"> 9 taken in the captioned matter or the same has been </div> <div style="display: flex; justify-content: space-between;"> 10 read to me. I request for the following changes </div> <div style="display: flex; justify-content: space-between;"> 11 be entered upon the record for the reasons </div> <div style="display: flex; justify-content: space-between;"> 12 indicated. </div> <div style="display: flex; justify-content: space-between;"> 13 I have signed my name to the Errata Sheet and the </div> <div style="display: flex; justify-content: space-between;"> 14 appropriate Certificate and authorize you to </div> <div style="display: flex; justify-content: space-between;"> 15 attach both to the original transcript. </div> <div style="display: flex; justify-content: space-between;"> 16 </div> <div style="display: flex; justify-content: space-between;"> 17 </div> <div style="display: flex; justify-content: space-between;"> 18 </div> <div style="display: flex; justify-content: space-between;"> 19 </div> <div style="display: flex; justify-content: space-between;"> 20 </div> <div style="display: flex; justify-content: space-between;"> 21 </div> <div style="display: flex; justify-content: space-between;"> 22 </div> <div style="display: flex; justify-content: space-between;"> 23 </div> <div style="display: flex; justify-content: space-between;"> 24 SIGNATURE: _____ DATE: _____ </div> <div style="display: flex; justify-content: space-between;"> 25 Julie Stone </div>	<div style="display: flex; justify-content: space-between;"> 1 C E R T I F I C A T E </div> <div style="display: flex; justify-content: space-between;"> 2 </div> <div style="display: flex; justify-content: space-between;"> 3 </div> <div style="display: flex; justify-content: space-between;"> 4 I, Leah Allbee, a Registered Professional </div> <div style="display: flex; justify-content: space-between;"> 5 Reporter, Certified Court Reporter and Notary Public </div> <div style="display: flex; justify-content: space-between;"> 6 of the State of New Jersey, do hereby certify that the </div> <div style="display: flex; justify-content: space-between;"> 7 foregoing Deposition of the witness Julie Stone, taken </div> <div style="display: flex; justify-content: space-between;"> 8 at the time and place aforesaid, is a true and correct </div> <div style="display: flex; justify-content: space-between;"> 9 transcription of my shorthand notes. </div> <div style="display: flex; justify-content: space-between;"> 10 I further certify that I am neither counsel </div> <div style="display: flex; justify-content: space-between;"> 11 for nor related to any party to said action, nor in </div> <div style="display: flex; justify-content: space-between;"> 12 any way interested in the result or outcome thereof. </div> <div style="display: flex; justify-content: space-between;"> 13 IN WITNESS WHEREOF, I have hereunto set my </div> <div style="display: flex; justify-content: space-between;"> 14 hand this 12th day of August, 2021. </div> <div style="display: flex; justify-content: space-between;"> 15 </div> <div style="display: flex; justify-content: space-between;"> 16 <i>Leah Allbee</i> </div> <div style="display: flex; justify-content: space-between;"> 17 Leah Allbee, RPR, CCR </div> <div style="display: flex; justify-content: space-between;"> 18 CCR# 30X100234500 </div> <div style="display: flex; justify-content: space-between;"> 19 Expires 6/30/2022 </div> <div style="display: flex; justify-content: space-between;"> 20 </div> <div style="display: flex; justify-content: space-between;"> 21 </div> <div style="display: flex; justify-content: space-between;"> 22 </div> <div style="display: flex; justify-content: space-between;"> 23 </div> <div style="display: flex; justify-content: space-between;"> 24 </div> <div style="display: flex; justify-content: space-between;"> 25 </div>
<div style="display: flex; justify-content: space-between;"> 1 I N D E X </div> <div style="display: flex; justify-content: space-between;"> 2 </div> <div style="display: flex; justify-content: space-between;"> 3 Witness: Julie Stone </div> <div style="display: flex; justify-content: space-between;"> 4 Examination by Mr. Tracy </div> <div style="display: flex; justify-content: space-between;"> 5 </div> <div style="display: flex; justify-content: space-between;"> 6 </div> <div style="display: flex; justify-content: space-between;"> 7 </div> <div style="display: flex; justify-content: space-between;"> 8 E X H I B I T S </div> <div style="display: flex; justify-content: space-between;"> 9 Defendant's Description Page </div> <div style="display: flex; justify-content: space-between;"> 10 Repicci/Stone </div> <div style="display: flex; justify-content: space-between;"> 11 For Ident. </div> <div style="display: flex; justify-content: space-between;"> 12 A Letter dated February 25, 2021 9 </div> <div style="display: flex; justify-content: space-between;"> 13 B Letter dated February 25, 2021 9 </div> <div style="display: flex; justify-content: space-between;"> 14 C Policy Number 7317144, dated 16 </div> <div style="display: flex; justify-content: space-between;"> 15 December 21, 2006 </div> <div style="display: flex; justify-content: space-between;"> 16 D Policy Number 7146026, dated 16 </div> <div style="display: flex; justify-content: space-between;"> 17 December 10, 2002 </div> <div style="display: flex; justify-content: space-between;"> 18 E Letter dated May 6, 2015 16 </div> <div style="display: flex; justify-content: space-between;"> 19 </div> <div style="display: flex; justify-content: space-between;"> 20 </div> <div style="display: flex; justify-content: space-between;"> 21 </div> <div style="display: flex; justify-content: space-between;"> 22 </div> <div style="display: flex; justify-content: space-between;"> 23 </div> <div style="display: flex; justify-content: space-between;"> 24 </div> <div style="display: flex; justify-content: space-between;"> 25 </div>	<div style="display: flex; justify-content: space-between;"> 1 </div> <div style="display: flex; justify-content: space-between;"> 2 </div> <div style="display: flex; justify-content: space-between;"> 3 </div> <div style="display: flex; justify-content: space-between;"> 4 </div> <div style="display: flex; justify-content: space-between;"> 5 </div> <div style="display: flex; justify-content: space-between;"> 6 </div> <div style="display: flex; justify-content: space-between;"> 7 </div> <div style="display: flex; justify-content: space-between;"> 8 </div> <div style="display: flex; justify-content: space-between;"> 9 </div> <div style="display: flex; justify-content: space-between;"> 10 </div> <div style="display: flex; justify-content: space-between;"> 11 </div> <div style="display: flex; justify-content: space-between;"> 12 </div> <div style="display: flex; justify-content: space-between;"> 13 </div> <div style="display: flex; justify-content: space-between;"> 14 </div> <div style="display: flex; justify-content: space-between;"> 15 </div> <div style="display: flex; justify-content: space-between;"> 16 </div> <div style="display: flex; justify-content: space-between;"> 17 </div> <div style="display: flex; justify-content: space-between;"> 18 </div> <div style="display: flex; justify-content: space-between;"> 19 </div> <div style="display: flex; justify-content: space-between;"> 20 </div> <div style="display: flex; justify-content: space-between;"> 21 </div> <div style="display: flex; justify-content: space-between;"> 22 </div> <div style="display: flex; justify-content: space-between;"> 23 </div> <div style="display: flex; justify-content: space-between;"> 24 </div> <div style="display: flex; justify-content: space-between;"> 25 </div>